

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE: Valsartan N-Nitrosodimethylamine (NDMA), and Irbesartan Products Liability Litigation	MDL No. 2875 Civil No.: 19-02875 (RBK)
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**NOTICE OF VIDEOTAPED DEPOSITION OF
PUTATIVE CLASS REPRESENTATIVE CHARLIE JOHNSTON**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Charlie Johnston on November 30, 2021 at 10:00 a.m. EST, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Golkow Technologies at scheduling@golkow.com to arrange for login credentials to be sent to them prior to the deposition.

The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition is:

Alyson Walker Lotman
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30 South 17th Street
Philadelphia, PA 19103-4196
(215) 979-1177
ALotman@duanemorris.com

Date: November 1, 2021

Respectfully submitted,

s/ Alyson Walker Lotman
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st of November, 2021, a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Charlie Johnston was served upon the following by e-mail, with copies to all defense counsel of record via CM/ECF:

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Golkow Technologies (via email)

s/ Alyson Walker Lotman
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